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Counsel for Debtor
Lusine Dokuzyan

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA
SAN FERNANDO VALLEY DIVISION

In re:
LUSINE CRISTINE DOKUZYAN,

Debtor.

Case No.: 1:22-bk-10283-MB

Chapter 7

**DEBTOR'S OPPOSITION AND MOTION
FOR PROTECTIVE ORDER RE:
CHAPTER 7 TRUSTEE'S INTENTION
TO RELEASE DOCUMENTS [DKT. 18]**

**DECLARATION OF LUSINE
DOKUZYAN FILED IN SUPPORT**

Hearing

Date: August 24, 2022

Time: 11:00 a.m.

Place: Courtroom 303

21041 Burbank Blvd.

Woodland Hills, CA 91367

See Supplemental Notice of Zoom
Hearing Filed Concurrently Herewith

TO HONORABLE MARTIN R. BARASH, U.S. BANKRUPTCY JUDGE;
CHAPTER 7 TRUSTEE AMY GOLDMAN; ALL OTHER PARTIES IN INTEREST:

Lusine Dokuzyan ("Debtor") respectfully asks the Court to enter a protective order with respect to the documents requested by creditor Hovanes Tonoyan ("Creditor") from the Chapter 7 Trustee Amy Goldman ("Trustee"). The Trustee filed a

1 “Notice of Chapter 7 Trustee’s Intention to Release Documents” (“Trustee’s
2 Notice”)[Dkt. 18]. Attached as **Exhibit A** is a copy of the Trustee’s Notice. The
3 Trustee intends to release, at the request of Creditor, copies of bank statements turned
4 over to the Trustee by the Debtor. This Trustee’s Notice was set on “negative notice”
5 and through this Opposition, Debtor requests a hearing be set under LBR9013-1(o)(4),
6 which says if a timely response is received, within 14 days the movant must file a notice
7 of hearing. The Court is asked to set this for hearing on August 24, 2022 at 11:00 a.m.

8 Debtor does not dispute the turnover of the bank statements per se, but merely
9 to redact the identifying characteristics on the bank statements (i.e. transactions and
10 names money was transferred to). The main reason is because Creditor has been
11 extremely aggressive in his efforts to derail the Debtor’s efforts for a fresh start. The
12 Creditor has sent text messages and calls to the Debtor with death threats telling her,
13 Debtor, to go kill herself. Creditor has ruined the Debtor’s physical psyche and has
14 caused Debtor to seek protection. The Creditor has contacted nearly all of the Debtor’s
15 friends and family members to harass them. Creditor is fixated on knowing every
16 intricate of this Debtor’s private life. Creditor sends text messages with varying
17 degrees of threats and outlandish comments. He did so also with Debtor’s counsel.
18 See attached as **Exhibit B** for a copy of these text messages.

19 The Creditor has also been harassing the Chapter 7 Trustee and the Office of the
20 United States Trustee to pursue the Debtor in claims that are unsubstantiated.

21 The history between the Debtor and Creditor stems from a friendship that turned
22 sour and abusive. Between Debtor and Creditor, the Debtor borrowed or took about
23 \$11,000 to pay a debt for a friend, Felipe, on account of a business debt. This
24 completely upset the Creditor and he went on a rampage to ruin her. Debtor filed this
25 Chapter 7 case for the main purpose of discharging the debt owed to him. Creditor
26 went on to disregard the automatic stay by constantly harassing Debtor. Creditor
27 consistently sent lengthy text messages that included statements about Creditor
28 wanting Debtor to die, telling her how she is not safe, and all her money will be gone

defending herself. Through outrage and malice, Creditor filed a baseless adversary proceeding on July 6, 2022, which will be subject to a separate motion to dismiss.

With respect to the documents to be released, i.e. the bank statements, the Debtor begs the Court to allow her, or the Trustee, to redact individual names on the bank statements of whom the Debtor transferred money to or engaged with. Absent that, the Creditor will see these names and contact these individuals in an effort to slander the Debtor and demand payments from these individuals.

The Chapter 7 Trustee has reviewed the names and there exists no cause or basis to pursue any of the people identified in the bank statements. Therefore, the Creditor has no reason to see the names of the people the Debtor transferred money to other than to continue his outlandish quest to ruin this poor girl's life.

Under FRCP 26(c), regarding Protective Orders, the Court has the power to protect a person from annoyance, embarrassment, oppression or undue burden and expense. The Court's protective order will not only help the Debtor but also the individuals and friends of the Debtor identified in the bank statements from considerable harassment by the Creditor. Again, Debtor does not dispute turnover of the bank statements but merely to redact the names identified in the descriptions. This limited redaction is a minor request and will not prejudice the Creditor.

Thus, cause exists to grant this protective request and allow redaction of the description section and names in the bank statements prior to turnover to the Creditor.

Respectfully submitted,

Dated: July 11, 2022

/s/ Sevan Gorginian

Sevan Gorginian, Esq.
Counsel for Debtor

DECLARATION OF LUSINE DOKUZYAN

I, Lusine Dokuzyan, declare as follows:

1. I am the debtor in this case. I am over 18 and have personal knowledge of the facts set above. My address is 7635 Bluebell Ave. N. Hollywood, CA 91605. If called as a witness, I could and would competently testify thereto.

2. I have known Hovanes Tonoyan for several years and know his behavioral patterns.

3. Hovanes has been extremely hurtful and verbally abusive to me.

4. I filed this bankruptcy case to get rid of a debt that I owed to him.

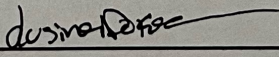
5. Over the last several months he has texted me and called my friends and some family members. He threatens them and tells them that I am a bad person. He uses more vulgar language of course. He wants to tell everyone that knows me of what I allegedly did to him and has made my life very difficult.

6. He has made death threats to me and has continually told me to go kill myself and that I am horrible person. But I am not. The text messages that are attached as **Exhibit B** is a glimpse of the type of harassment we have been subjected to.

7. He emailed my bankruptcy attorney with the same verbally abuse language and he just won't stop.

8. I do not mind turning over my bank statements that are with the Trustee but I beg the Court to please allow me or the Trustee to redact the names in the bank statements. Otherwise, Hovanes is going to Google them and find their contact information on social media and continue his hatred and cruelty.

9. My friends and individuals identified in the bank statements do not deserve that and should be left alone. I ask the Court to please protect their identity from Hovanes finding out their identity.



Lusine Dokuzyan, Declarant

EXHIBIT A

AMY L. GOLDMAN,
Marisol.Jaramillo@lewisbrisbois.com
633 W. 5th Street, Suite 4000
Los Angeles, CA 90071
Telephone: 213.250.1800
Facsimile: 213.250.7900

Chapter 7 Trustee

UNITED STATES BANKRUPTCY COURT
CENTRAL DISTRICT OF CALIFORNIA DIVISION
SAN FERNANDO VALLEY DIVISION

In re

Lusine Cristine Dokuzyan,

Debtors.

Case No. 1:22-bk-10283-MB

Chapter 7

**NOTICE OF CHAPTER 7 TRUSTEE'S
INTENTION TO RELEASE
DOCUMENTS**

[11 U.S.C. § 704(a)(7)]

[No Hearing Required]

TO ALL PARTIES IN INTEREST:

PLEASE TAKE NOTICE that Amy L. Goldman, the Chapter 7 Trustee (the "Trustee") for the estate of Lusine Cristine Dokuzyan (the "Debtor"), intends to release certain account statements of the Debtor to Hovanes John Tonoyan, in accordance with 11 U.S.C. § 704(a)(7), which provides that the Trustee shall: "unless the court orders otherwise, furnish such information concerning the estate and the estate's administration as is requested by a party in interest." Specifically, Hovanes John Tonoyan on behalf of himself, has requested copies of all documents and records produced by the Debtor to the Trustee during the course of the Trustee's investigation of the Debtor's assets and liabilities (the "Documents").

1 **PLEASE TAKE FURTHER NOTICE THAT** the Trustee intends to release the
2 Documents to Hovanes John Tonoyan unless a motion for a protective order is filed within 14
3 days after service of this Notice, and the Bankruptcy Court enters an order prohibiting production
4 of the Documents.

5
6 Dated: June 29, 2022

/s/ Amy L. Goldman
Amy L. Goldman, Chapter 7 Trustee

PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 633 W. 5th Street, Suite 4000, Los Angeles, California 90071

A true and correct copy of the foregoing document entitled (*specify*): **NOTICE OF CHAPTER 7 TRUSTEE'S INTENTION TO RELEASE DOCUMENTS** will be served or was served (a) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (b) in the manner stated below:

1. **TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF)**: Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On June 29, 2022, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

- **CHAPTER 7 TRUSTEE Amy L Goldman (TR)** marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com;ecf.alert+Goldman@titlexi.com
- **DEBTOR ATTORNEY Sevan Gorginian** sevan@gorginianlaw.com, 2486@notices.nextchapterbk.com;ani@gorginianlaw.com
- **UNITED STATES TRUSTEE United States Trustee (SV)** ustpregion16.wh.ecf@usdoj.gov

☐ Service information continued on attached page

2. **SERVED BY UNITED STATES MAIL**:

On June 29, 2022 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

DEBTOR

Lusine Cristine Dokuzyan
7635 Bluebell Ave.
North Hollywood, CA 91605

☐ Service information continued on attached page

3. **OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (state method for each person or entity served): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) June 29, 2022, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

CREDITOR Hovanes John Tonoyan - Via Email: hoviktonoyan@gmail.com

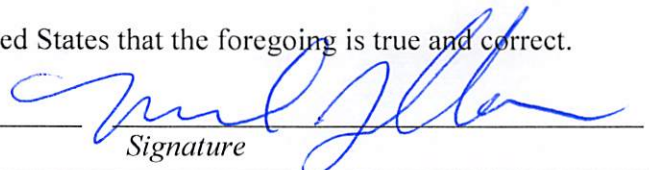
☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

June 29, 2022
Date

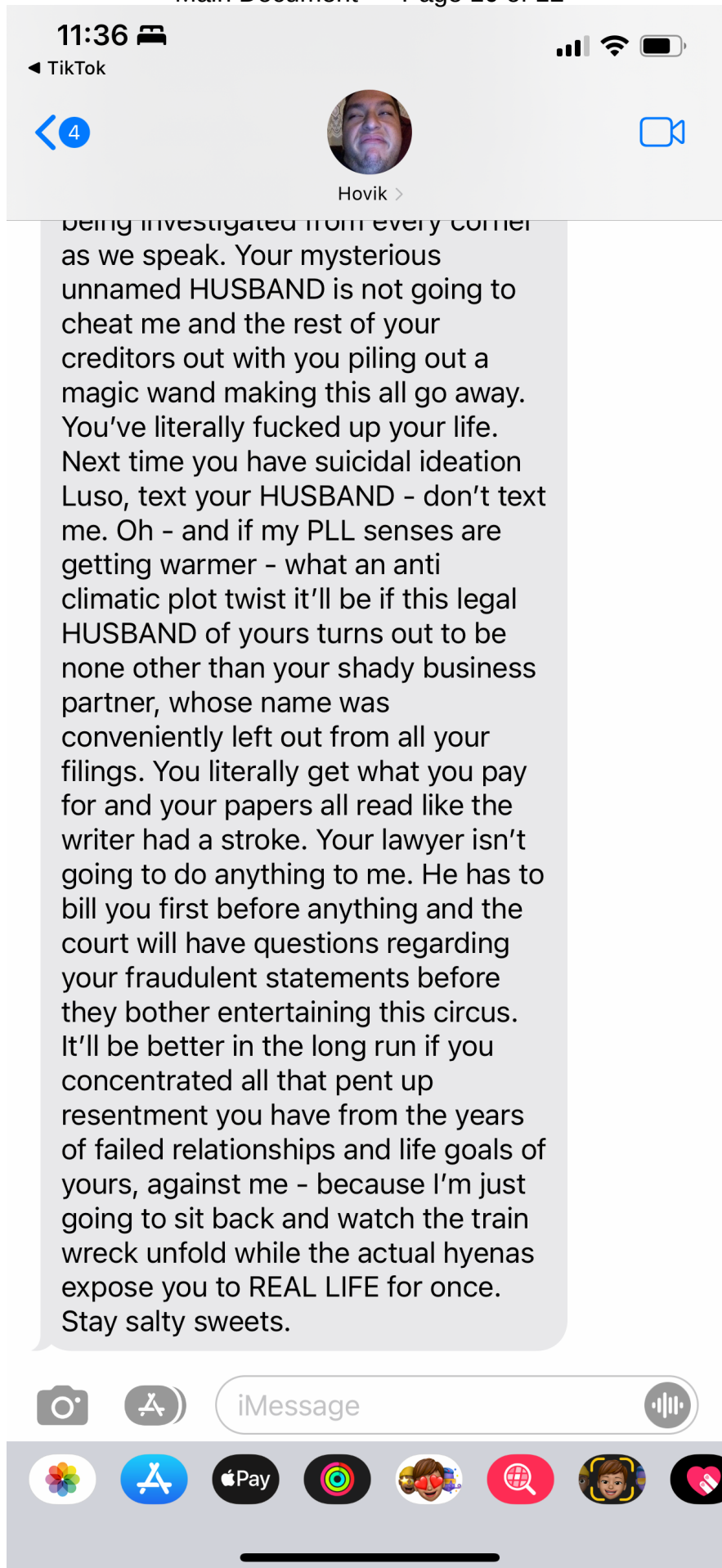
Marisol Jaramillo
Printed Name

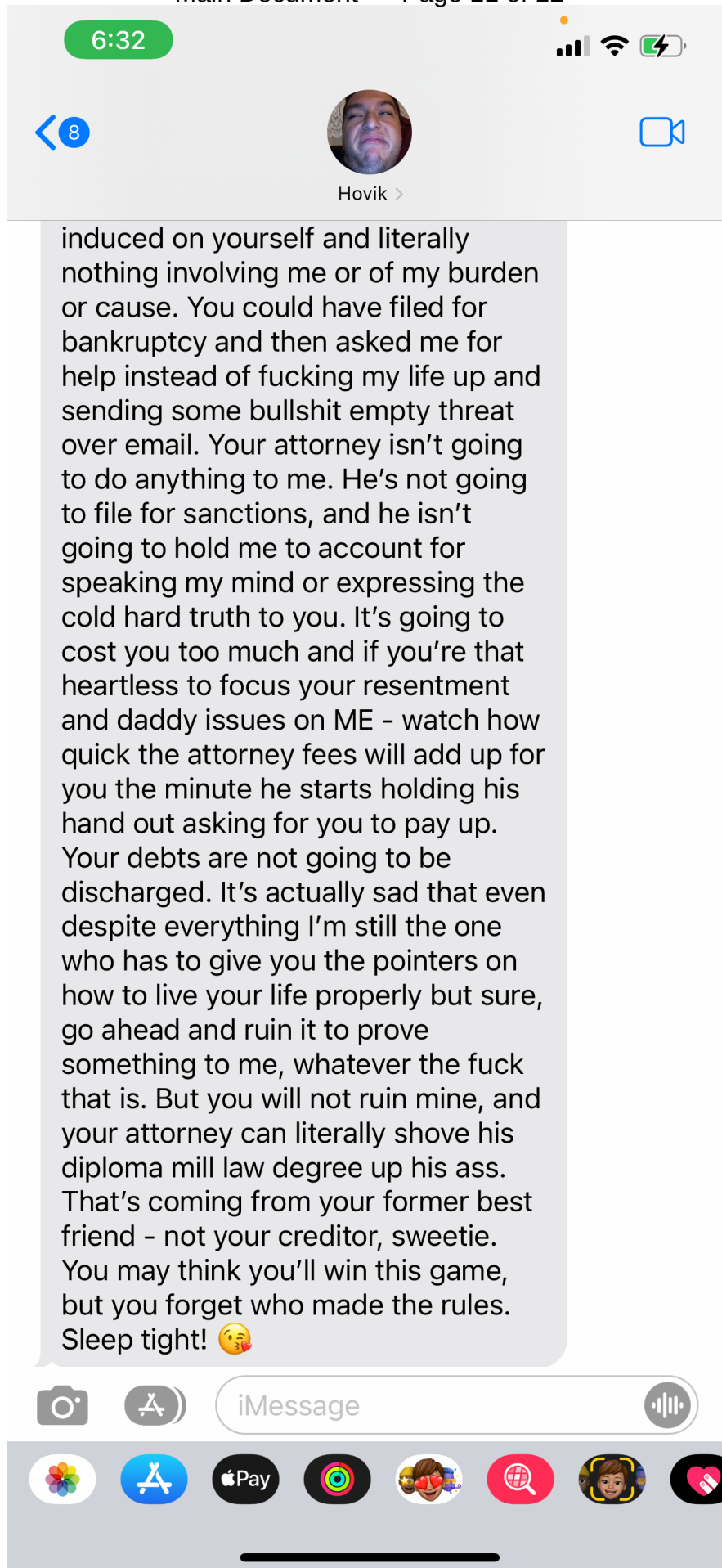
Signature



This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

EXHIBIT B





PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: **450 N. Brand Blvd. Suite 600 Glendale, CA 91203**

A true and correct copy of the foregoing document entitled (*specify*): **DEBTOR'S OPPOSITION AND MOTION FOR PROTECTIVE ORDER RE: CHAPTER 7 TRUSTEE'S INTENTION TO RELEASE DOCUMENTS [DKT. 18]** will be served or was served **(a)** on the judge in chambers in the form and manner required by LBR 5005-2(d); and **(b)** in the manner stated below:

1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF): Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **7/11/22**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Amy L Goldman (TR)
marisol.jaramillo@lewisbrisbois.com, AGoldman@iq7technology.com; ecf.alert+Goldman@titlexi.com

Sevan Gorginian on behalf of Debtor Lusine Cristine Dokuzyan
sevan@gorginianlaw.com, 2486@notices.nextchapterbk.com; ani@gorginianlaw.com

United States Trustee (SV)
ustpreion16.wh.ecf@usdoj.gov

2. SERVED BY UNITED STATES MAIL:

On (*date*) July 12, 2022 I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

PRESIDING JUDGE

Hon. Martin R. Barash
U.S. Bankruptcy Court
21041 Burbank Blvd. Suite 342
Woodland Hills, CA 91367

Creditor (per address on his complaint filed in the adversary case)
HOVANES JOHN TONAYAN
6627 Beeman Avenue
North Hollywood, CA 91606

3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*), I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

July 12, 2022

Date

Ani Minasyan

Name

/s/ Ani Minasyan

Signature